

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512



December 22, 2008

Doug Wheeler
Vice President
GWF Energy LLC
4300 Railroad Avenue
Pittsburg, CA 94565

Dear Mr. Wheeler,

**HANFORD ENERGY PARK PEAKER AMENDMENT FOR CONVERSION TO GWF
HANFORD COMBINED-CYCLE POWER PLANT (01-EP-7) DATA REQUESTS,
ROUND 2**

Pursuant to Title 20, California Code of Regulations, section 1769, the California Energy Commission staff requests the information specified in the enclosed data requests. The information requested is necessary to more fully understand the modifications proposed in the amendment petition filed on October 1, 2008 by GWF Energy, LLC, project owner, for the proposed Hanford Combined-Cycle Power Plant Project. These requests are in addition to the first round of data requests, No.s 1-11, sent to GWF on December 9, 2008.

Specifically, the requested information will assist Energy Commission staff to determine whether implementation of the proposed modifications will: 1) allow the GWF Hanford Combined-Cycle Power Plant to operate in a safe, efficient and reliable manner, 2) comply with applicable laws, ordinances, and regulations, or 2) result in significant environmental impacts.

This set of data requests is being made in the area of Air Quality. Written responses to the enclosed data requests are due to the Energy Commission staff on or before January 22, 2009 or at such later date as may be mutually agreed.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, you must send a written notice to both Commissioner Jeffrey Byron, Presiding Siting Committee Member for the Hanford Energy Park Peaker Amendment Petition, and to me, within 20 days of receipt of this letter.

**GWF Hanford Combined Cycle Power Plant (01-EP-7)
Data Requests, Round 2**

The notification must contain the reasons for not providing the information, the need for additional time, and the grounds for any objections (see Title 20, California Code of Regulations, section 1716).

If you have any questions, please call me at (916) 654-4748 or E-mail me at mtrask@energy.state.ca.us.

Sincerely,

Mathew Trask
Amendment Project Manager
Energy Facility Siting Division

Enclosures

**GWF Hanford Combined Cycle Power Plant (01-EP-7)
Data Requests, Round 2**

Technical Area: Air Quality

Author: William Walters

BACKGROUND: EMISSION REDUCTION CREDITS

In order to evaluate the air quality impacts from this project staff need to confirm the emission reduction credits (ERCs) that were surrendered for the Hanford peaker project.

DATA REQUEST

12. Please confirm that the ERCs as listed in the May 5, 2001, Hanford 21-Day Staff Assessment plus May 7, 2001, Errata pages 75 through 81 were surrendered in 2001/2002, or if not please provide a modified ERC list that shows the ERCs that were surrendered along with information on:
 - a. the location of reduction(s);
 - b. the method of reduction; and,
 - c. the date of reduction for each of the ERCs not evaluated in the 2001 staff assessment.

BACKGROUND – CONSTRUCTION EMISSIONS CALCULATION – VEHICLE CLASS

The onsite and offsite emissions calculations for on-road vehicles appear to have used incorrect vehicle classes and the offsite emissions do not include paved road dust calculations. Staff needs the applicant to correct any emission calculation errors.

DATA REQUEST

13.
 - a. Please verify the classification of offsite delivery trucks, onsite water truck and concrete pump truck as a Heavy Heavy Duty Truck (HHDT) vehicle class, and
 - b. Update the emission calculations using the correct vehicle emission factors where applicable.
14. Please include an estimate of the paved road dust PM10 and PM2.5 emissions in the offsite emission totals.

BACKGROUND – CONSTRUCTION GREENHOUSE GAS EMISSIONS

The Amendment Petition does not include an estimate for construction related greenhouse gas emissions. Staff needs this estimate to complete the greenhouse gas analysis for the project.

DATA REQUEST

15. Please provide calculations for the project construction greenhouse gas emissions in CO2-equivalent tons for the entire construction period, and include estimates of total fuel use by type of fuel.

**GWF Hanford Combined Cycle Power Plant (01-EP-7)
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BACKGROUND: OPERATING EMISSIONS – MODELING ASSUMPTIONS

The derivation of the modeled emission values presented in Table C3-5 is not clear and there appear to be errors in the values. Staff needs additional information to assess the applicant's operations modeling analysis.

DATA REQUEST

16.
 - a. Please provide the specific operating assumptions, in particular the number of startups and shutdowns assumed.
 - b. Provide the explicit calculations used to derive the hourly and annual emissions values provided in Table C3-5.
17.
 - a. Please identify why the short-term NO_x emissions values for simple-cycle and combined-cycle operation shown in Table C3-5 are identical even though the normal operating and startup/shutdown emissions are lower for combined cycle operation.
 - b. Identify whether similar issues occur for other pollutants and averaging times.

BACKGROUND: CUMULATIVE IMPACTS

The Petition for License Amendment mentions that the Hanford Community Development Department and the Kings County Planning Department was contacted about proposed or foreseeable developments in the site area. However, the San Joaquin Air Pollution Control District (SJAPCD) should also have been contacted to determine if any new stationary sources were recently built or are proposed to be built within six miles of the site. Additionally, staff believes that the existing petroleum coke fired generating station at the site, due to its localized impacts, should be included in a cumulative modeling analysis.

Additionally, staff would like to note that the applicant's cumulative impacts analysis discussion (Section 3.1.2.3.4) errs when it says that there are no residential uses and schools within one mile of the project site. There are a limited number of residences within a mile of the site with the closest residence being approximately one-half mile east of the site.

DATA REQUEST

18. Please provide a list of recently built or proposed stationary source projects, within a six mile radius of the project site, from the San Joaquin Air Pollution Control District for the project area.
19. Please complete a cumulative modeling analysis that includes the existing petroleum coke fired generating facility, including all existing emission sources such as the cooling tower, and any other sources with more than 5 tons/year of any modeled pollutant discovered through the SJVAPCD stationary source information request above.

**GWF Hanford Combined Cycle Power Plant (01-EP-7)
Data Requests, Round 2**

BACKGROUND: AIR QUALITY PERMIT/DETERMINATION OF COMPLIANCE

A Determination of Compliance (DOC) analysis from the SJVAPCD will be needed for staff's analysis. Staff will need to coordinate with the applicant and District to keep apprised of any air quality issues determined by the District during their permit review.

DATA REQUEST

20. Please provide copies of any official submittals and correspondence to or from the District within 5 days of their submittal to or their receipt from the District.

BACKGROUND: AMMONIA SLIP CONCENTRATION

Staff is unclear on what the applicant is proposing for an ammonia slip concentration limit during simple cycle operation versus what they are proposing during combined cycle operation. A review of this project's amendment request versus the similar Henrietta project amendment request shows different assumptions.

DATA REQUEST

21. Please provide the proposed ammonia slip concentration limit for simple cycle operation, and the corresponding ammonia mass emission rate in lbs/hour.
22. Please provide the proposed ammonia slip concentration limit for combined cycle operation, and the corresponding ammonia mass emission rate in lbs/hour.